

Colorado Department of Public Health and Environment

OPERATING PERMIT

CANYON GAS RESOURCES, INC. CLOUGH COMPRESSOR STATION

ISSUED DECEMBER 1, 1999 LAST REVISED OCTOBER 31, 2001

AIR POLLUTION CONTROL DIVISION COLORADO OPERATING PERMIT

FACILITY NAME: Clough Compressor OPERATING PERMIT NUMBER

Station

FACILITY ID: 0450077

ISSUE DATE: December 1, 1999 EXPIRATION DATE: December 1, 2004

MODIFICATIONS: See Appendix F of Permit

Issued in accordance with the provisions of Colorado Air Quality Control Act, 25-7-101 et seq. (1989 & 1995 Supp.) and applicable rules and regulations.

96OPGA137

ISSUED TO: PLANT SITE LOCATION:

Canyon Gas Resources, Inc. NE 1/4 of Section 13, T6S, R94W

8080 North Central Expressway, Suite 900 Approximately 5 Miles West of the city of Rifle

Dallas, TX 75206 Garfield County

INFORMATION RELIED UPON

Operating Permit Application Received: 02/15/96

And Additional Information Received: 02/13/96, 05/14/96, 09/09/96

Nature of Business: Gas gathering

Primary SIC: 1311

RESPONSIBLE OFFICIAL FACILITY CONTACT PERSON

Name: Danny L. Thompson Name: Andrea McMillen

Title: VP Engineering and Operations Title: Environmental Compliance Specialist

Phone: (214) 750-9223 Phone: (972) 367-2644

SUBMITTAL DEADLINES

Semi-Annual Monitoring Period: April 1 - September 30, October 1 - March 31

Semi-Annual Monitoring Report: November 1, 2001 & May 1, 2002 and subsequent years

Annual Compliance Period: Begins April 1 to March 31

Annual Compliance Certification: May 1, 2002 and subsequent years

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SECTION I - General Activities and Summary

1. Permitted Activities

1.1 This facility consists of four (4) triethylene glycol dehydration units and five (5) natural gas fired internal combustion engines powering five (5) compressors.

The facility is located approximately five (5) miles west of the city of Rifle in Garfield County, Colorado. The area in which the plant operates is designated as attainment for all criteria pollutants. There are no affected states within 50 miles of the plant. The following Federal Class I designated areas are within 100 kilometers of the plant: Flattops Wilderness Area; Maroon Bells - Snowmass Wilderness Area; West Elk Wilderness Area.

- 1.2 Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air pollutants from this facility in accordance with the requirements, limitations, and conditions of this permit.
- This Operating Permit incorporates the applicable requirements contained in the underlying construction permits, and does not affect those applicable requirements, except as modified during review of the application or as modified subsequent to permit issuance using the modification procedures found in Regulation No. 3, Part C. These Part C procedures meet all applicable substantive New Source review requirements of Part B. Any revisions made using the provisions of Regulation No. 3, Part C shall become new applicable requirements for purposes of this operating permit and shall survive reissuance. This permit incorporates the applicable requirements (except as noted in Section II) from the following construction permits: 91GA566 (1-2), 93GA1477, 96GA494 (1-3), 96GA616, 97GA0102 and 97GA0103.
- 1.4 All conditions in this permit are enforceable by US Environmental Protection Agency, Colorado Air Pollution Control Division (hereinafter Division) and its agents, and citizens unless otherwise specified. **State-only enforceable conditions are:**

Permit Condition Number(s): Section IV - Conditions 13, 17

1.5 There are no other Operating Permits associated with this facility for purposes of determining applicability of Prevention of Significant Deterioration regulations.

2. Alternative Operating Scenarios

The following Alternative Operating Scenario (AOS) for temporary engine replacement has been reviewed in accordance with the requirements of Regulation No. 3., Part A, Section IV.A, Operational Flexibility-Alternative Operating Scenarios, and Regulation No. 3, Part B, Construction Permits, and has been found to meet all applicable substantive and procedural requirements. This permit incorporates and shall be considered a construction permit for any engine replacement performed in accordance with this AOS, and the permittee shall be allowed to perform such engine replacement without applying for a revision to this permit or obtaining a new Construction Permit.

For purposes of Regulation No. 3, Part B, Section IV.G.4.a., any engine replacement authorized under this AOS shall commence operation upon notation of same in the contemporaneous log as required below. Results of any testing required below shall be normalized for comparison to the applicable permitted emission limits.

2.1 Temporary Engine Replacement

The following AOS is incorporated into this permit in order to deal with a compressor engine breakdown or periodic routine maintenance and repair which requires the use of a temporary replacement engine. "Temporary" is defined as in the same service for 270 operating days or less in any 12 month period. The 270 days is the total number of days that the engine is in operation. If the engine operates only part of a day, that day counts towards the 270 day total. Note that the compliance demonstrations made as part of this AOS are in addition to any compliance demonstrations required by the permit.

2.1.1 The permittee may temporarily replace an existing compressor engine that is subject to the emission limits set forth in this permit with an engine that is of the same manufacturer, model, and horsepower or a different manufacturer, model, or horsepower as the existing engine without modifying this permit.

The permittee shall measure nitrogen oxide (NO_x) and carbon monoxide (CO) emissions in the exhaust from the temporary replacement engine using a portable flue gas analyzer within seven (7) calendar days of commencing operation of the temporary replacement engine. Calibration of the analyzer shall be conducted according to manufacturer=s instructions.

In the absence of evidence to the contrary, results of the portable flue gas analyzer test shall be evidence of enforceable compliance or noncompliance of the temporary replacement engine with the emission limitations of the original engine.

An exceedance of either the NO_x or CO emission limitation during the initial portable flue gas analyzer test shall require a subsequent portable flue gas analyzer test indicating compliance with both the NO_x and CO emission limitations within 14 calendar days of commencing operation of the replacement engine. Calibration gases shall be used to calibrate the portable analyzer for all tests conducted subsequent to the initial test.

If portable flue gas analyzer results indicate compliance with both the NO_x and CO emission limitations within the 14 day period, the temporary replacement engine will be considered to be in compliance for purposes of this AOS from the time that the replacement engine commenced operation until the replacement engine is taken off line.

If portable flue gas analyzer results fail to indicate the compliance with either the NO_x or CO emission limitations within the 14 day period, the source will notify the Division in writing within 10 calendar days of the end of the 14 day period. In the absence of evidence to the contrary, the temporary replacement engine will be considered to be out of compliance from the time that the temporary replacement engine commenced operation until the engine is taken off line. Results of all testing that indicates noncompliance shall be submitted to the Division within 10 calendar days of the end of the 14 day period.

- 2.1.2 The permittee may temporarily replace a grandfathered or permit exempt engine or an engine that is not subject to emission limits without modifying this permit. Potential emissions from the temporary replacement engine must be less than or equal to the potential emissions from the original grandfathered or permit exempt engine or for the engine that is not subject to emission limits, as determined by applying appropriate emission factors.
- 2.1.3 Temporary replacement engines, whether of the same manufacturer, model, and horsepower, or of a different manufacturer, model, or horsepower, are subject to all federally applicable and state-only requirements set forth in this permit (including monitoring and record keeping), and shall be subject to any shield afforded by this permit.
- 2.1.4 The permittee shall maintain a log on-site to contemporaneously record the start and stop date of any temporary engine replacement, the manufacturer, model number, horsepower, and serial number of the engine(s) that are temporarily replaced during the term of this permit, and the manufacturer, model number, horsepower, and serial number of the replacement engine.
- 2.1.5 Results of all tests conducted pursuant to this AOS shall be kept on site for five (5) years and made available to the Division upon request.
- 2.1.6 For comparison with an annual or short term emissions limit, the results of any testing required by this AOS shall be converted to a lb/hr basis and multiplied by the allowable operating hours in the month or year (whichever applies) in order to monitor compliance. If a source is not limited in its hours of operation, the test results shall be multiplied by the maximum number of hours in the month or year (8760), whichever applies.

2.2 Additional Sources

Current State Air Quality Regulations do not allow for advanced New Source Review in the absence of discrete and verifiable information concerning future installations. Therefore, any additional operational changes requiring new equipment at this facility not addressed by these Alternative Operating Scenarios will need to undergo appropriate Regulation No. 3 review procedures.

3. Prevention of Significant Deterioration

- 3.1 This facility is a major stationary source (potential to emit of any criteria pollutant > 250 tpy) for the purposes of Prevention of Significant Deterioration (PSD) requirements (Colorado Regulation 3, Part B, Section IV.D.3). Modifications up to this point in time have not triggered significance levels which would bring about PSD review. Future modifications to this facility which are in excess of significance levels as defined in Colorado Regulation 3, Part A, Section I.B.58 will result in the application of the PSD review requirements.
- 3.2 There are no other Operating Permits associated with this facility for purposes of determining applicability of Prevention of Significant Deterioration regulations.

4. Accidental Release Prevention Program (112 (r))

- 4.1 This facility is not subject to the provisions of the Accidental Release Prevention Program (section 112(r) of the Federal Clean Air Act).
- **5.** Summary of Emission Units
- 5.1 The emissions units regulated by this permit are the following:

Emission Unit Number	AIRS Point Number	Facility ID	Description	Pollution Control Device
S001	001		Waukesha Model F2895GU, Serial Number 263059, 4-Cycle, Standard Rich Burn, Natural Gas Fired Internal Combustion Engine with a Maximum Fuel Design Rate of 2.65 MMBTU/Hr and 310 Site Rated Horsepower.	None
S002	002		Caterpillar Model G399, Serial Number 49C800, 4-Cycle, Standard Rich Burn, Natural Gas Fired Internal Combustion Engine with a Maximum Fuel Design Rate of 3.91 MMBTU/Hr and 472 Site Rated Horsepower.	
S003	003		Caterpillar Model G399, Serial Number 49C697, 4-Cycle, Standard Rich Burn, Natural Gas Fired Internal Combustion Engine with a Maximum Fuel Design Rate of 3.91 MMBTU/Hr and 472 Site Rated Horsepower.	
S004	004		Caterpillar Model G399 NA HCR, Serial Number 49C771, 4-Cycle, Standard Rich Burn, Natural Gas Fired Internal Combustion Engine with a Maximum Fuel Design Rate of 3.59 MMBTU/Hr and 472 Site Rated Horsepower.	
S005	005		P&A Model PA-6MM-1000-3P, Serial Number 188, 6 MMscf/Day, Triethylene Glycol Dehydrator with Flash Tank and natural gas fired reboiler.	
S006	006		P&A Model PA-6MM-1000-3P, Serial Number 189, 6 MMscf/Day, Triethylene Glycol Dehydrator with Flash Tank and natural gas fired reboiler.	
S007	007		Sivalls Model GCR-500-450, Serial Number 42721, 12 MMscf/Day, Triethylene Glycol Dehydrator with Flash Tank and natural gas fired reboiler.	
F008	008		Fugitive VOC Emissions	
S009	009		Waukesha Model L36GL, Serial Number C1154571, 4-Cycle, Clean Burn Design, Natural Gas Fired Internal Combustion Engine with a Maximum Fuel Design Rate of 6.4 MMBTU/Hr and 750 Site Rated Horsepower.	

Emission Unit Number	AIRS Point Number	Facility ID	Description	Pollution Control Device
S010	010		Natco Dehy, Serial Number HL-9D74602-02, 8 MMscf/Day, Triethylene Glycol Dehydrator with Flash Tank and natural gas fired reboiler.	

SECTION II - Specific Permit Terms

1. S001 - Waukesha Model: F2895GU, S/N: 263059, ICE

Parameter		Permit Condition Number	Limitations	Compliance Emission Factor	Monitoring Method	Interval
Emissions Calculation		1.1.		NOx 15.0 g/hp-hr CO 15.0 g/hp-hr VOC 2.0 g/hp-hr	Calculation	Annually
Hours Operation	of	1.2.				Monthly
Opacity		1.3.	Less than or equal to 20%		Fuel Use Restriction	Annually

1.1 Yearly emissions of each pollutant shall be calculated using the emission factors (EF) listed above (Source provided manufacturer's values), maximum site rated horsepower, and hours of operation in the following equation:

Lbs/Year = (EF) X (Hours of Operation, hr/yr) X (Site Rated Horsepower, hp) X (1 lb /453.6 g)

- 1.2 Hours of operation shall be determined monthly and records shall be maintained and made available for inspection upon request.
- 1.3 Opacity of emissions from this engine shall not exceed 20% (Colorado Regulation No. 1, Section II.A.1). In the absence of credible evidence to the contrary, compliance with the 20% opacity limit shall be presumed whenever natural gas is used as fuel for the engine.
- 1.4 These engines shall be operated and maintained in accordance with internal operating and maintenance standards, which shall consider manufacturer's recommendations and industry standard practices, at all times, including periods of start-up, shutdown, and malfunction. Such internal operating and maintenance standards shall be kept on site and made available to the Division upon request.

2. S002, S003 & S004: Caterpillar Model: G399, S/N: 49C800, 49C697 & 49C771, ICEs

	Permit Condition	Limitations		Compliance	Monitoring	
Parameter	Number	Short Term	Long Term	Emission Factor	Method	Interval
NOx	2.1.	N/A	66.0 TPY	4.09 lb/MMBTU	Fuel Meter, Hours of	Monthly
СО		N/A	54.6 TPY	3.39 lb/MMBTU	Operation, BTU Gas Analysis	
VOC		N/A	4.6 TPY	0.28 lb/MMBTU	Allalysis	
Fuel Use	2.2.	35.9 MMSCF/yr			Fuel Meter	Monthly
Opacity	2.3.	Less than or	equal to 20%		Fuel Use Restriction	Annually

Parameter	Permit Condition Number	Limit Short Term	ations Long Term	Compliance Emission Factor	Monitor Method	ring Interval
BTU Gas Analysis	2.4.				Recordkeeping & Calculations	Semi-Annual
Hours of Operation	2.5.				Recordkeeping	Monthly

- 2.1 Nitrogen Oxide, Carbon Monoxide, and Volatile Organic Compounds emissions shall not exceed the limitations stated above for each engine (Construction Permits 91GA566 1 & 2 and 93GA1477, as modified under the provisions of Section I, Condition 1.3). Emissions from insignificant activities must be tracked and records maintained.
 - 2.1.1 Monthly emissions of each pollutant shall be calculated for each engine using the listed compliance emission factors (EF) (derived from g/hp-hr Manufacturer Values), monthly fuel consumption, and the latest BTU gas analysis from Section II, Condition 2.4 in the following equation:
 - Lbs/Month = (EF) X (Monthly Fuel Use in MMSCF) X (Heat Content of Fuel in MMBTU/MMSCF)
 - 2.1.2 A twelve month rolling total shall be maintained for each engine for demonstration of compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data. Emissions shall be calculated by the end of each subsequent month.
- 2.2 Fuel consumption for each engine shall not exceed the limitations stated above (Construction Permits 91GA566 1&2).
 - 2.2.1 Fuel use for each engine shall be measured and recorded each month. Within the first seven days of every month, the fuel meter shall be read and recorded. Allocation of fuel use to each engine shall be made using the methods detailed in Appendix G of this permit. The fuel use shall be measured no more than one (1) hour from the time that run time hours have been recorded. A twelve month rolling total shall be maintained for demonstration of compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.
- 2.3 Opacity of emissions from these engines shall not exceed 20% (Colorado Regulation No. 1, Section II.A.1). In the absence of credible evidence to the contrary, compliance with the 20% opacity limit shall be presumed whenever natural gas is used as fuel for these engines.

Samples of fuel gas shall be collected and analyzed to determine C_1 through C_{6+} composition. The lower heating value of the fuel shall be calculated semi-annually using the results of the analysis and published heats of combustion (on the basis that combustion occurs with products and reactants in the vapor state) in terms of Btu/scf at 60 EF and 14.696 psia in the following equation:

$$LHV \; Btu/scf = \frac{\sum_{i} (C_{i} \; mol \; \%)(Hc_{i} \; Btu/scf)}{100}$$
where:

 $C_i = Concentration of Component i mol \%$

 H_{C_i} = Heat of Combustion (vapor state of reactants) at 60 °F, 14.696 psia Btu/scf

Calculation of monthly emissions required under Condition 2.1 shall be made using the calculated lower heating value based on the most recent required analysis in Condition 2.4.

- 2.5 Hours of operation shall be recorded monthly for use in determining fuel allocations.
- 2.6 These engines shall be operated and maintained in accordance with internal operating and maintenance standards, which shall consider manufacturer's recommendations and industry standard practices, at all times, including periods of start-up, shutdown, and malfunction. Such internal operating and maintenance standards shall be kept on site and made available to the Division upon request.

3. S009 - Waukesha Model L36GL, S/N C1154571, ICE

Parameter	Permit Condition Number	Limit Short Term	ations Long Term	Compliance Emission Factor	Monitoring Method	Interval
NOx	3.1.	N/A	18.83 TPY	0.67 lb/MMBTU	Fuel Meter, Hours of	Monthly
CO	1	N/A	12.68 TPY	0.45 lb/MMBTU	Operation, BTU Gas Analysis	
VOC		N/A	7.24 TPY	0.26 lb/MMBTU	Allalysis	
Fuel Use	3.2.	61.6 M	Mscf/yr		Fuel Meter	Monthly
Opacity	3.3.	Less than or equal to 20%			Fuel Use Restriction	Annually
Portable Monitoring	3.4.	$NOx \le 4.3 \text{ lbs/hr}$ $CO \le 2.89 \text{ lbs/hr}$			Portable Flue Gas Analyzer	Quarterly
Performance Test	3.5.	$NOx \le 4.3 \text{ lbs/hr}$ $CO \le 2.89 \text{ lbs/hr}$			EPA Reference Method	One Time
Exhaust Gas Oxygen Concentration	3.6.				Portable Analyzer	Quarterly to Semi-Annually
Btu Content	3.7.				Recordkeeping &	Semi-Annually

		Calculation	
Hours of Operation	3.8.	Recordkeeping	Monthly
Operation			

- 3.1 Nitrogen Oxide (NO_x), Carbon Monoxide (CO), and Volatile Organic Compounds (VOC) emissions shall not exceed the limitations stated above (Construction Permit 97GA0102). Emissions from insignificant activities must be tracked and records maintained.
 - 3.1.1 Monthly emissions of each pollutant shall be calculated using the listed compliance emission factors (EF) (derived from g/hp-hr Manufacturer Values), monthly fuel consumption, and the latest BTU gas analysis from Condition 4.7 in the following equation:
 - Lbs/Month = (EF) X (Monthly Fuel Use in MMSCF) X (Heat Content of Fuel in MMBTU/MMSCF)
 - 3.1.2 A twelve month rolling total shall be maintained for demonstration of compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data. Emissions shall be calculated by the end of the subsequent month
- 3.2 Fuel consumption shall not exceed the limitations stated above (Construction Permit 97GA0102).
 - 3.2.1 Fuel use for each engine shall be measured and recorded each month. Within the first seven days of every month, the fuel meter shall be read and recorded. Allocation of fuel use to each engine shall be made using the methods detailed in Appendix G of this permit. The fuel use shall be measured no more than one (1) hour from the time that run time hours have been recorded. A twelve month rolling total shall be maintained for demonstration of compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.
- 3.3 Opacity of emissions from this engine shall not exceed 20% (Colorado Regulation No. 1, Section II.A.1). In the absence of credible evidence to the contrary, compliance with the 20% opacity limit shall be presumed whenever natural gas is used as fuel for the engine.
- 3.4 Emission measurements of nitrogen oxides (NO_x) and carbon monoxide (CO) from each engine shall be conducted quarterly using a portable flue gas analyzer. Calibration of the analyzer shall be conducted according to manufacturer's instructions. Results of the portable flue gas analyzer tests shall be used to monitor the compliance status of each engine. For comparison with an annual or short term emissions limit, the results of the tests shall be converted to a lb/hr basis and multiplied by the allowable operating hours in the month or year (whichever applies) in order to monitor compliance. If a source is not limited in its hours of operation the test results will be multiplied by the maximum number of hours in the month or year (8760), whichever applies.

An exceedance of either the NO_x or CO emission limitation during the initial portable flue gas analyzer test shall require a subsequent portable analyzer test indicating compliance with both the NO_x and CO emission limitations within 14 calendar days of the initial test. Calibration gases shall be used to calibrate the portable analyzer for all tests conducted subsequent to the initial test.

If portable flue gas analyzer results indicate compliance with both the NO_x and CO emission limitations within the 14 day period, the source may certify that the engine is in compliance with both the NO_x and CO emission limitations for the relevant time period.

If portable flue gas analyzer results fail to indicate the compliance of the engine with either the NO_x or CO emission limitations within the 14 day period, the source will notify the Division in writing within 10 calendar days of the end of the 14 day period. Results of all testing that indicates noncompliance shall be submitted to the Division within 10 calendar days of the end of the 14 day period. The source will be required to conduct EPA Reference Test Methods (identified as Reference Method 7E and Reference Method 10, or Reference Method 19 (40C.F.R. Part 60 Appendix A), hereinafter "EPA Reference Test Methods") or other test methods or procedures acceptable to the Division within 45 calendar days of the end of the 14 day period allowed for the portable flue gas analyzer testing. The Division shall be notified at least 30 calendar days prior to the EPA Reference Test date, so that it may choose whether to observe the testing.

If the EPA Reference Test results indicate compliance with both the NO_x and CO emission limitations, the source may certify that the engine is in compliance with both the NO_x and CO emission limitations for the relevant time period.

If the EPA Reference Tests fail to demonstrate compliance with either the NO_x or CO emission limitations and in the absence of evidence to the contrary, the engine will be considered to be out of compliance from the date of the initial portable flue gas analyzer test until the engine is taken off line. Results of all testing that indicates noncompliance shall be submitted to the Division within 14 calendar days after receipt of the test results.

Results of all tests conducted shall be kept on site and made available to the Division upon request.

- 3.5 A performance test shall be conducted within six (6) months of permit issuance on this engine to verify compliance with the Nitrogen Oxide (NO_X) and Carbon Monoxide (CO) emission rates. If the performance test indicates compliance with the emission limits then future compliance shall be demonstrated as required under condition 3.4. Tests shall be conducted using a protocol approved by the Division. The protocol shall be submitted at least 30 days prior to any testing required under this condition. The test protocol must be in accordance with the requirements of the Air Pollution Control Division Compliance Test manual. All performance tests shall be witnessed by Division personnel at the Division's discretion.
- 3.6 Exhaust gas Oxygen content shall be tested using a portable analyzer to ensure that the engine is operating in lean/clean burn mode. Frequency testing shall be as described in Condition 3.4.

- 3.7 The BTU content of the natural gas used to fuel the engines shall be determined using the method described in Condition 2.4
- 3.8 Hours of operation shall be recorded monthly for use in determining fuel allocations.
- 3.9 These engines shall be operated and maintained in accordance with internal operating and maintenance standards, which shall consider manufacturer's recommendations and industry standard practices, at all times, including periods of start-up, shutdown, and malfunction. Such internal operating and maintenance standards shall be kept on site and made available to the Division upon request.

4. S005 (West) & S006 (East): P&A Model PA-6MM-1000-3P, S/Ns: 188 & 189

Triethylene Glycol Dehydration Units

Paramete	er	Permit Condition Number	Limitations Long Term	Compliance Emission Factor	Monitoring Method Interval	
VOC	S005 S006	4.1.	81.7 TPY 54.9 TPY	Based on Input to GLYCALC Model	Parametric	Monthly
Extended Analysis		4.2.			EPA Reference Methods	Quarterly(To Annually)
Gas Proc	essed	4.3.	2,190.0 MMSCF /yr		Flow Meter	Monthly

4.1 Volatile Organic Compound emissions shall not exceed the limitations stated above (Construction Permits #96GA494-1 & -2, as modified under the provisions of Section I, Condition 1.3). Emissions from insignificant activities must be tracked and records maintained. The glycol dehydration unit shall be considered to be operating in compliance with the emission limit if all of the following conditions are met:

Parameter	Value		Units	Criteria
	S005	S006		
Inlet (Wet) Gas Temperature		75	degrees Fahrenheit	Above
Glycol Circulation Rate	1.35	0.83	gallons per minute	Below
Benzene Content of Gas	1	150	parts per million	Below
Toluene Content of Gas	250		parts per million	Below
Ethyl Benzene Content of Gas	10		parts per million	Below
Xylenes Content of Gas	120		parts per million	Below
n-Hexane Content of Gas	520		parts per million	Below

The triethylene glycol circulation rate and inlet (wet) gas temperature for this unit shall be measured and recorded daily. The average value for each of these parameters shall be determined for any month during which a daily recorded parameter fails the stipulated passing criteria compared to the values listed in the table above. If the average glycol circulation rate or inlet gas temperature do not meet the stipulated passing criteria, the GRI

GLYCALC (Ver. 2.0 or higher) model shall be run to determine daily and monthly emission rates. Inputs to the model will be the recorded average values for inlet temperature, glycol circulation rate, gas data from the most recent required analysis (see below), calculated daily inlet gas throughput required by Condition 4.3 and an assumed value of 720 psia for inlet gas pressure.

The circumstances surrounding any day on which the required parameters fail to be measured and recorded shall be described in a log to be maintained on-site. Data from the last day for which data exists may be substituted for missing data in the event the calculation of a monthly-average value is required.

If a GLYCALC run is required for any reason for a given month, the pounds per hour of emissions predicted by the model shall be compared to the hourly VOC limit for determination of compliance. A rolling 12-month total for VOC emissions shall be maintained to determine compliance with the annual limit. The 12-month total shall be assumed to be equal to the annual limit for any 12-month period for which no GLYCALC runs were triggered and for any period for which a GLYCALC run was triggered but the results of the run predict compliance with the hourly VOC limit. If the source chooses, the 12-month rolling total may be based on actual emissions, provided GLYCALC was run, using the average daily parameters as required by condition 4.1, for each month. Records of actual annual emission calculations shall be maintained and made available to the Division upon request. The calculation of the 12-month total shall be performed for any month a GLYCALC run is triggered if the results of the run fail to predict compliance with the hourly VOC limit. If the 12-month total exceeds the annual limit, emissions for the previous months must be calculated with GLYCALC using the parameters described in above until the rolling 12-month total is in compliance with the annual limitation.

- 4.2 Samples of inlet gas shall be collected and analyzed (extended gas analysis) to determine C_1 to C_6 , n-hexane, benzene, toluene, ethyl benzene and total xylene (BTEX) composition once per quarter. A GLYCALC model run will be conducted using the previous months data if any of the concentrations for BTEX listed in the table above are exceeded. Frequency of extended gas analyses shall move to semi-annually after the first year, then to annually after the second year if BTEX concentrations remain consistently below the established values. Frequency will revert back to quarterly if any of the BTEX constituents exceed the listed values.
- 4.3 The quantity of gas processed by the glycol dehydration unit shall not exceed the limitations listed above (Permit 96GA494 1&2). The gas throughput to the dehydration unit shall be recorded monthly using existing flow meters. A twelve month rolling total will be maintained to verify compliance with annual limitations.

5. S007 & S010: Sivalls Model GCR-500-450, S/N: 42721 and Natco, S/N HL-9D74602-02 Triethylene Glycol Dehydration Units

Parame	eter	Permit Condition Number	Limitations Long Term	Compliance Emission Factor	Monito Method	oring Interval
VOC	S007 S010	5.1.	91.7 TPY 86.5 TPY	Based on Input to GLYCALC Model	Parametric	Monthly

Parame	eter	Permit Condition Number	Limitations Long Term	Compliance Emission Factor	Monito Method	oring Interval
Extended G Analysis	as	5.2.			EPA Reference Methods	Quarterly(To Annually)
Gas	S007	5.3.	4380 MMscf/yr		Flow Meter	Monthly
Processed	S010		2920 MMscf/yr			

- 5.1 Same as Condition 5.1 using the limitations as stated above. S007 & S010 shall use the same parameters as S005. (Construction Permits # 96GA494-3 and 97GA0103, as modified under the provisions of Section I, Condition 1.3)
- 5.2 Same as Condition 4.2.
- 5.3 Same as Condition 4.3 with the limitations as stated above (Construction Permit # 96GA494-3).

6. F008 - Fugitive VOC Emissions From Equipment Leaks

	Permit Condition	Limitations		Moni	toring
Parameter	Number	Long Term	Compliance Emission Factor	Method	Interval
VOC	6.1.	2.6 tons/yr	By Component Type - EPA's Protocol for Equipment Leaks	Recordkeeping	As Noted

6.1 VOC emissions from equipment leaks shall not exceed the limitations stated above (Colorado Construction Permit 96GA616). Emissions shall be calculated using the emission factors and equations listed below:

Emission Factors for individual types of components in lbs/component-hr (Protocol for Equipment Leak Emission Estimates, EPA-453/R-95-017).

Connectors = 0.00044

Flanges = 0.00858

Open-ended Line = 0.0044

*Other = 0.01936

Pump = 0.00528

Valve = 0.0099

* "Other" emission factor should be applied to any component not specifically listed.

Emissions of VOC per component:

No. of Components x EF (lbs/component-hr) x 8760 hrs/yr x VOC content of gas

- 6.1.1 The most recent gas analysis as required under Conditions 2.4 of this Permit shall be used to determine the appropriate % VOC to use in the above equation.
- 6.1.2 A component count shall be conducted within 90 days of the issuance of this permit and every five (5) years thereafter to verify existing components and inventory.
- 6.1.3 A running total shall be kept of all additions and subtractions to the component count. The most recent count shall be used for emission calculations and compliance purposes.

SECTION III - Permit Shield

Regulation No. 3, 5 CCR 1001-5, Part A, § I.B.43; Part C, §§ V.C.1.b. & D., XIII; §§ 25-7-111(2)(I), 25-7-114.4(3)(a), C.R.S.

1. Specific Conditions

The following parameters and requirements have been specifically identified as non-applicable to the facility to which this permit has been issued:

Emission Unit Description &Number	Applicable Requirement	Justification
ALL	40 CFR Part 60 New Source Performance Standard, Subpart KKK (Adopted by Reference in Colorado Regulation No. 6, Part B) - Equipment Leaks of VOC from Onshore Natural Gas Processing Plants	This facility is not a natural gas processing plant as defined in the subpart.
Storage Vessels	40 CFR Part 60 New Source Performance Standard, Subparts K, Ka, and Kb (Adopted by Reference in Colorado Regulation No. 6, Part B) - Storage Vessels for Petroleum Liquids, and Volatile Organic Liquid Storage Vessels	This facility does not store materials meeting the definition or petroleum liquid or meet the size threshold given in these subparts.
ALL	40 CFR Part 72 (Adopted by Reference in Colorado Regulation No. 6, Part B) - Acid Rain Program	This facility does not operate an affected unit as defined by this part.
ALL	Colorado Regulation No. 7 (Except Sections V, VI.B.1, VI.B.2, VII.C)	This regulation applies to facilities in ozone non-attainment areas only. This facility is located in an ozone attainment area.

2. General Conditions

Compliance with this Operating Permit shall be deemed compliance with all applicable requirements specifically identified in the permit and other requirements specifically identified in the permit as not applicable to the source. This permit shield shall not alter or affect the following:

- 2.1 The provisions of §§ 25-7-112 and 25-7-113, C.R.S., or § 303 of the federal act, concerning enforcement in cases of emergency;
- 2.2 The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- 2.3 The applicable requirements of the federal Acid Rain Program, consistent with § 408(a) of the federal act;

- 2.4 The ability of the Air Pollution Control Division to obtain information from a source pursuant to § 25-7-111(2)(I), C.R.S., or the ability of the Administrator to obtain information pursuant to § 114 of the federal act;
- 2.5 The ability of the Air Pollution Control Division to reopen the Operating Permit for cause pursuant to Regulation No. 3, Part C, § XIII.
- 2.6 Sources are not shielded from terms and conditions that become applicable to the source subsequent to permit issuance.

SECTION IV - General Permit Conditions

1. Administrative Changes

Regulation No. 3, 5 CCR 1001-5, Part A, III.

The permittee shall submit an application for an administrative permit amendment to the Division for those permit changes that are described in Regulation No. 3, Part A, \Box I.B.36.a. The permittee may immediately make the change upon submission of the application to the Division.

2. Certification Requirements

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.B.9., V.C.16.a.&e. and V.C.17.

- Any application, report, document and compliance certification submitted to the Air Pollution Control Division pursuant to Regulation No. 3 or the Operating Permit shall contain a certification by a responsible official of the truth, accuracy and completeness of such form, report or certification stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
- b. All compliance certifications for terms and conditions in the Operating Permit shall be submitted to the Air Pollution Control Division at least annually unless a more frequent period is specified in the applicable requirement or by the Division in the Operating Permit.
- c. Compliance certifications shall contain:
 - (i) the identification of each permit term and condition that is the basis of the certification;
 - (ii) the compliance status of the source;
 - (iii) whether compliance was continuous or intermittent;
 - (iv) the method(s) used for determining the compliance status of the source, currently and over the reporting period; and
 - such other facts as the Air Pollution Control Division may require to determine the compliance status of the source.
- d. All compliance certifications shall be submitted to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit.
- e. If the permittee is required to develop and register a risk management plan pursuant to § 112(r) of the federal act, the permittee shall certify its compliance with that requirement; the Operating Permit shall not incorporate the contents of the risk management plan as a permit term or condition.

3. Compliance Requirements

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.C.9., V.C.11. & 16.d., § 25-7-122.1(2), C.R.S.

a. The permittee must comply with all conditions of the Operating Permit. Any permit noncompliance relating to federally enforceable terms or conditions constitutes a violation of the federal act, as well as the state act and Regulation No. 3. Any permit noncompliance relating to state-only terms or conditions constitutes a violation of the state act and Regulation No. 3, shall be enforceable pursuant to state law, and shall not be enforceable by citizens under § 304 of the federal act. Any such violation of the federal act, the

state act or regulations implementing either statute is grounds for enforcement action, for permit termination, revocation and reissuance or modification or for denial of a permit renewal application.

- b. It shall not be a defense for a permittee in an enforcement action or a consideration in favor of a permittee in a permit termination, revocation or modification action or action denying a permit renewal application that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.
- c. The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of any request by the permittee for a permit modification, revocation and reissuance, or termination, or any notification of planned changes or anticipated noncompliance does not stay any permit condition, except as provided in §§ X. and XI. of Regulation No. 3, Part C.
- d. The permittee shall furnish to the Air Pollution Control Division, within a reasonable time as specified by the Division, any information that the Division may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Division copies of records required to be kept by the permittee, including information claimed to be confidential. Any information subject to a claim of confidentiality shall be specifically identified and submitted separately from information not subject to the claim.
- e. Any schedule for compliance for applicable requirements with which the source is not in compliance at the time of permit issuance shall be supplemental, and shall not sanction noncompliance with, the applicable requirements on which it is based.
- f. For any compliance schedule for applicable requirements with which the source is not in compliance at the time of permit issuance, the permittee shall submit, at least every 6 months unless a more frequent period is specified in the applicable requirement or by the Air Pollution Control Division, progress reports which contain the following:
 - (i) dates for achieving the activities, milestones, or compliance required in the schedule for compliance, and dates when such activities, milestones, or compliance were achieved; and
 - (ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- g. The permittee shall not knowingly falsify, tamper with, or render inaccurate any monitoring device or method required to be maintained or followed under the terms and conditions of the Operating Permit.

4. Emergency Provisions

Regulation No. 3, 5 CCR 1001-5, Part C, § VII.

An emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed the technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. "Emergency" does not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error. An emergency constitutes an affirmative defense to an enforcement action brought for noncompliance with a technology-based emission limitation if the permittee demonstrates, through properly signed, contemporaneous operating logs, or other relevant evidence that:

a. an emergency occurred and that the permittee can identify the cause(s) of the emergency;

- b. the permitted facility was at the time being properly operated;
- c. during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- d. the permittee submitted oral notice of the emergency to the Air Pollution Control Division no later than noon of the next working day following the emergency, and followed by written notice within one month of the time when emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

This emergency provision is in addition to any emergency or upset provision contained in any applicable requirement.

5. Emission Standards for Asbestos

Regulation No. 8, 5 CCR 1001-10, Part B

The permittee shall not conduct any asbestos abatement activities except in accordance with the provisions of Regulation No. 8, Part B, "emission standards for asbestos."

6. Emissions Trading, Marketable Permits, Economic Incentives

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.13.

No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are specifically provided for in the permit.

7. Fee Payment

Regulation No. 3, 5 CCR 1001-5, Part A, § VI.; Part C, § V.C.12.

- a. The permittee shall pay an annual emissions fee in accordance with Regulation No. 3, Part A, Section VI. A 1% per month late payment fee shall be assessed against any invoice amounts not paid in full on the 91st day after the date of invoice, unless a permittee has filed a timely protest to the invoice amount.
- b. The permittee shall pay a permit processing fee of \$50 per hour. If the Division estimates that processing of the permit will take more than 30 hours, it will notify the permittee of its estimate of what the actual charges may be prior to commencing any work exceeding the 30 hour limit.
- c. The permittee shall pay an APEN fee of \$100 for each APEN or revised APEN filed.

8. Fugitive Particulate Emissions

Regulation No. 1, 5 CCR 1001-3, § III.D.1.

The permittee shall employ such control measures and operating procedures as are necessary to minimize fugitive particulate emissions into the atmosphere, in accordance with the provisions of Regulation No. 1, [] III.D.1.

9. Inspection and Entry

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.16.b.

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Air Pollution Control Division, or any authorized representative, to perform the following:

- a. enter upon the permittee's premises where an Operating Permit source is located, or emissions-related activity is conducted, or where records must be kept under the terms of the permit;
- b. have access to, and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- c. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the Operating Permit;
- d. sample or monitor at reasonable times, for the purposes of assuring compliance with the Operating Permit or applicable requirements, any substances or parameters.

10. Minor Permit Modifications

Regulation No. 3, 5 CCR 1001-5, Part C, §§ X. & XI.

The permittee shall submit an application for a minor permit modification before making the change requested in the application. The permit shield shall not extend to minor permit modifications.

11. New Source Review

Regulation No. 3, 5 CCR 1001-5, Part B

The permittee shall not commence construction or modification of a source required to be reviewed under the New Source Review provisions of Regulation No. 3, Part B, without first receiving a construction permit.

12. No Property Rights Conveyed

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.11.d.

This permit does not convey any property rights of any sort, or any exclusive privilege.

13. Odor

Regulation No. 2, 5 CCR 1001-3

As a matter of state law only, the permittee shall comply with the provisions of Regulation No. 2 concerning odorous emissions.

14. Off-Permit Changes to the Source

Regulation No. 3, 5 CCR 1001-5, Part C, § XII.B.

The permittee shall record any off-permit change to the source that causes the emissions of a regulated pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from the change, including any other data necessary to show compliance with applicable ambient air quality standards. The permittee shall provide contemporaneous notification to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit. The permit shield shall not apply to any off-permit change.

15. Opacity

Regulation No. 1, 5 CCR 1001-3, §§ I., II.

The permittee shall comply with the opacity emissions limitation set forth in Regulation No. 1, \square I.-II.

16. Open Burning

Regulation No. 1, 5 CCR 1001-3, §§ II.C.1.

The permittee shall obtain a permit from the Division for any regulated open burning activities in accordance with provisions of Regulation No. 1, \square II.C.1.

17. Ozone Depleting Compounds

Regulation No. 15, 5 CCR 1001-17

The permittee shall comply with the provisions of Regulation No. 15 concerning emissions of ozone depleting compounds. Sections I., II.C., II.D., III. IV., and V. of Regulation No. 15 shall be enforced as a matter of state law only.

18. Permit Expiration and Renewal

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.B.6., IV.C., V.C.2.

- a. The permit term shall be five (5) years. The permit shall expire at the end of its term. Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted.
- b. Applications for renewal shall be submitted at least twelve months, but not more than 18 months, prior to the expiration of the Operating Permit. An application for permit renewal may address only those portions of the permit that require revision, supplementing, or deletion, incorporating the remaining permit terms by reference from the previous permit. A copy of any materials incorporated by reference must be included with the application.

19. Portable Sources

Regulation No. 3, 5 CCR 1001-5, Part C, § II.D.

Portable Source permittees shall notify the Air Pollution Control Division at least 10 days in advance of each change in location.

20. Prompt Deviation Reporting

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.7.b.

The permittee shall promptly report any deviation from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. Unless required by a permit term or condition to report deviations on a more frequent basis, "prompt" reporting shall entail submission of reports of deviations from permit requirements every six (6) months in accordance with paragraph 21.d. below. "Prompt reporting" does not constitute an exception to the requirements of "Emergency Provisions" for the purpose of avoiding enforcement actions.

21. Record Keeping and Reporting Requirements

Regulation No. 3, 5 CCR 1001-5, Part A, § II.; Part C, §§ V.C.6., V.C.7.

- a. Unless otherwise provided in the source specific conditions of this Operating Permit, the permittee shall maintain compliance monitoring records that include the following information:
 - (i) date, place as defined in the Operating Permit, and time of sampling or measurements;
 - (ii) date(s) on which analyses were performed;
 - (iii) the company or entity that performed the analysis;
 - (iv) the analytical techniques or methods used;
 - (v) the results of such analysis; and
 - (vi) the operating conditions at the time of sampling or measurement.
- b. The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report or application. Support information, for this purpose, includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Operating Permit. With prior approval of the Air Pollution Control Division, the permittee may maintain any of the above records in a computerized form.
- c. Permittees must retain records of all required monitoring data and support information for the most recent twelve (12) month period, as well as compliance certifications for the past five (5) years on-site at all times. A permittee shall make available for the Air Pollution Control Division's review all other records of required monitoring data and support information required to be retained by the permittee upon 48 hours advance notice by the Division.
- d. The permittee shall submit to the Air Pollution Control Division all reports of any required monitoring at least every six (6) months, unless an applicable requirement, the enhanced monitoring rule, or the Division requires submission on a more frequent basis. All instances of deviations from any permit requirements must be clearly identified in such reports.
- e. The permittee shall file an Air Pollutant Emissions Notice ("APEN") prior to constructing, modifying, or altering any facility, process, activity which constitutes a stationary source from which air pollutants are or are to be emitted, unless such source is exempt from the APEN filing requirements of Regulation No. 3, Part A, § II.D. A revised APEN shall be filed annually whenever a significant change in emissions, as defined in Regulation No. 3, Part A, § II.C.2., occurs; whenever there is a change in owner or operator of any facility, process, or activity; whenever new control equipment is installed; whenever a different type of control equipment replaces an existing type of control equipment; whenever a permit limitation must be modified; or before the APEN expires. An APEN is valid for a period of five years. The five-year period recommences when a revised APEN is received by the Air Pollution Control Division. Revised APENs shall be submitted no later than 30 days before the five-year term expires. Permittees submitting revised APENs to inform the Division of a change in actual emission rates must do so by April 30 of the following year. Where a permit revision is required, the revised APEN must be filed along with a request for permit revision. APENs for changes in control equipment must be submitted before the change occurs. Annual fees are based on the most recent APEN on file with the Division.

22. Reopenings for Cause

Regulation No. 3, 5 CCR 1001-5, Part C, § XIII.

- a. The Air Pollution Control Division shall reopen, revise, and reissue Operating Permits; permit reopenings and reissuance shall be processed using the procedures set forth in Regulation No. 3, Part C, § III., except that proceedings to reopen and reissue permits affect only those parts of the permit for which cause to reopen exists.
- b. The Division shall reopen a permit whenever additional applicable requirements become applicable to a major source with a remaining permit term of three or more years, unless the effective date of the requirements is later than the date on which the permit expires, or unless a general permit is obtained to address the new requirements; whenever additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program; whenever the Division determines the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or whenever the Division determines that the permit must be revised or revoked to assure compliance with an applicable requirement.
- c. The Division shall provide 30 days' advance notice to the permittee of its intent to reopen the permit, except that a shorter notice may be provided in the case of an emergency.
- d. The permit shield shall extend to those parts of the permit that have been changed pursuant to the reopening and reissuance procedure.

23. Section 502(b)(10) Changes

Regulation No. 3, 5 CCR 1001-5, Part C, § XII.A.

The permittee shall provide a minimum 7-day advance notification to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit. The permittee shall attach a copy of each such notice given to its Operating Permit.

24. Severability Clause

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.10.

In the event of a challenge to any portion of the permit, all emissions limits, specific and general conditions, monitoring, record keeping and reporting requirements of the permit, except those being challenged, remain valid and enforceable.

25. Significant Permit Modifications

Regulation No. 3, 5 CCR 1001-5, Part C, §III.B.2.

The permittee shall not make a significant modification required to be reviewed under Regulation No. 3, Part B ("Construction Permit" requirements) without first receiving a construction permit. The permittee shall submit a complete Operating Permit application or application for an Operating Permit revision for any new or modified source within twelve months of commencing operation, to the address listed in Item 1 in Appendix D of this permit. If the permittee chooses to use the "Combined Construction/Operating Permit" application procedures of Regulation No. 3, Part C, then the Operating Permit must be received prior to commencing construction of the new or modified source.

26. Special Provisions Concerning the Acid Rain Program

Regulation No. 3, 5 CCR 1001-5, Part C, §§ V.C.1.b. & 8

- a. Where an applicable requirement of the federal act is more stringent than an applicable requirement of regulations promulgated under Title IV of the federal act, 40 Code of Federal Regulations (CFR) Part 72, both provisions shall be incorporated into the permit and shall be federally enforceable.
- b. Emissions exceeding any allowances that the source lawfully holds under Title IV of the federal act or the regulations promulgated thereunder, 40 CFR Part 72, are expressly prohibited.

27. Transfer or Assignment of Ownership

Regulation No. 3, 5 CCR 1001-5, Part C, § II.C.

No transfer or assignment of ownership of the Operating Permit source will be effective unless the prospective owner or operator applies to the Air Pollution Control Division on Division-supplied Administrative Permit Amendment forms, for reissuance of the existing Operating Permit. No administrative permit shall be complete until a written agreement containing a specific date for transfer of permit, responsibility, coverage, and liability between the permittee and the prospective owner or operator has been submitted to the Division.

28. Volatile Organic Compounds

Regulation No. 7, 5 CCR 1001-9, §§ III & V.

a. For sources located in an ozone non-attainment area or the Denver Metro Attainment Maintenance Area, all storage tank gauging devices, anti-rotation devices, accesses, seals, hatches, roof drainage systems, support structures, and pressure relief valves shall be maintained and operated to prevent detectable vapor loss except when opened, actuated, or used for necessary and proper activities (e.g. maintenance). Such opening, actuation, or use shall be limited so as to minimize vapor loss.

Detectable vapor loss shall be determined visually, by touch, by presence of odor, or using a portable hydrocarbon analyzer. When an analyzer is used, detectable vapor loss means a VOC concentration exceeding 10,000 ppm. Testing shall be conducted as in Regulation No. 7, Section VIII.C.3.

Except when otherwise provided by Regulation No. 7, all volatile organic compounds, excluding petroleum liquids, transferred to any tank, container, or vehicle compartment with a capacity exceeding 212 liters (56 gallons), shall be transferred using submerged or bottom filling equipment. For top loading, the fill tube shall reach within six inches of the bottom of the tank compartment. For bottom-fill operations, the inlet shall be flush with the tank bottom.

b. The permittee shall not dispose of volatile organic compounds by evaporation or spillage unless Reasonably Available Control Technology (RACT) is utilized.

29. Wood Stoves and Wood burning Appliances

Regulation No. 4, 5 CCR 1001-6

The permittee shall comply with the provisions of Regulation No. 4 concerning the advertisement, sale, installation, and use of wood stoves and wood burning appliances.

OPERATING PERMIT APPENDICES

- A INSPECTION INFORMATION
- B COMPLIANCE MONITORING REPORT FORMAT
- C COMPLIANCE CERTIFICATION REPORT FORMAT
- **D-NOTIFICATION ADDRESSES**
- **E-PERMIT ACRONYMS**
- F PERMIT MODIFICATIONS

*DISCLAIMER:

None of the information found in these Appendices shall be considered to be State or Federally enforceable, except as otherwise provided in the permit, and is presented to assist the source, permitting authority, inspectors, and citizens.

APPENDIX A - Inspection Information

Directions to Plant

The plant is located approximately five (5) miles west of Rifle along Interstate 70.

Safety Equipment Required:

Eye Protection Hard Hat Safety Shoes Hearing Protection NOMEX (flame resistant clothing) suit

Facility Plot Plan:

The attached figure shows the plot plan as submitted on February 15, 1996 with the source's Title V Operating Permit Application.

List of Insignificant Activities:

The following list of insignificant activities was provided by the source to assist in the understanding of the facility layout. Since there is no requirement to update such a list, activities may have changed since the last filing.

Insignificant activities and/or sources of emissions as submitted in the application are as follows:

- 1. Lube oil storage tanks (300 gallons)
- 2. Crank-case oil storage tanks (500 gallons)
- 3. TEG storage tanks (100 and 500 gallons)
- 4. Ambitrol (propylene glycol solution) storage tank (300 gallon)
- 5. Water storage tanks (1050, 2520, and 12600 gallon)
- 6. Glycol dehydrator reboilers

APPENDIX B - Reporting Requirements and Definitions

with codes ver 9/1/00

Please note that, pursuant to 113(c)(2) of the federal Clean Air Act, any person who knowingly:

- (A) makes any false material statement, representation, or certification in, or omits material information from, or knowingly alters, conceals, or fails to file or maintain any notice, application, record, report, plan, or other document required pursuant to the Act to be either filed or maintained (whether with respect to the requirements imposed by the Administrator or by a State);
- (B) fails to notify or report as required under the Act; or
- (C) falsifies, tampers with, renders inaccurate, or fails to install any monitoring device or method required to be maintained or followed under the Act shall, upon conviction, be punished by a fine pursuant to title 18 of the United States Code, or by imprisonment for not more than 2 years, or both. If a conviction of any person under this paragraph is for a violation committed after a first conviction of such person under this paragraph, the maximum punishment shall be doubled with respect to both the fine and imprisonment.

The permittee must comply with all conditions of this operating permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

The Part 70 Operating Permit program requires three types of reports to be filed for all permits. All required reports must be certified by a responsible official.

Report #1: Monitoring Deviation Report (due at least every six months)

For purposes of this operating permit, the Division is requiring that the monitoring reports are due every six months unless otherwise noted in the permit. All instances of deviations from permit monitoring requirements must be clearly identified in such reports.

For purposes of this operating permit, monitoring means any condition determined by observation, by data from any monitoring protocol, or by any other monitoring which is required by the permit as well as the recordkeeping associated with that monitoring. This would include, for example, fuel use or process rate monitoring, fuel analyses, and operational or control device parameter monitoring.

Report #2: Permit Deviation Report (must be reported "promptly")

In addition to the monitoring requirements set forth in the permits as discussed above, each and every requirement of the permit is subject to deviation reporting. The reports must address deviations from permit

requirements, including those attributable to upset conditions and malfunctions as defined in this Appendix, the probable cause of such deviations, and any corrective actions or preventive measures taken. All deviations from any term or condition of the permit are required to be summarized or referenced in the annual compliance certification.

For purposes of this operating permit, "upset" shall refer to both emergency conditions and upsets. Additional discussion on these conditions is provided later in this Appendix.

For purposes of this operating permit, the Division is requiring that the permit deviation reports are due every six months unless otherwise noted in the permit. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. For example, quarterly Excess Emission Reports required by an NSPS or Regulation No. 1, Section IV.

In addition to the monitoring deviations discussed above, included in the meaning of deviation for the purposes of this operating permit are any of the following:

- (1) A situation where emissions exceed an emission limitation or standard contained in the permit;
- (2) A situation where process or control device parameter values demonstrate that an emission limitation or standard contained in the permit has not been met;
- (3) A situation in which observations or data collected demonstrates noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit; or,
- (4) A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred.

For reporting purposes, the Division has combined the Monitoring Deviation Report with the Permit Deviation Report. All deviations shall be reported using the following codes:

1 = Standard: When the requirement is an emission limit or standard 2 = Process: When the requirement is a production/process limit

3 = Monitor: When the requirement is monitoring 4 = Test: When the requirement is testing

5 = Maintenance: When required maintenance is not performed
 6 = Record: When the requirement is recordkeeping
 7 = Report: When the requirement is reporting

8 = CAM: A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the

Compliance Assurance Monitoring (CAM) Rule) has occurred.

9 = Other: When the deviation is not covered by any of the above categories

Report #3: Compliance Certification (annually, as defined in the permit)

Submission of compliance certifications with terms and conditions in the permit, including emission limitations, standards, or work practices, is required not less than annually.

Compliance Certifications are intended to state the compliance status of each requirement of the permit over the certification period. They must be based, at a minimum, on the testing and monitoring methods specified in the permit that were conducted during the relevant time period. In addition, if the owner or operator knows of other material information (i.e. information beyond required monitoring that has been specifically assessed in relation to how the information potentially affects compliance status), that information must be identified and addressed in the compliance certification. The compliance certification must include the following:

- The identification of each term or condition of the permit that is the basis of the certification;
- The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each permit term and condition during the certification period and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required in the permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Clean Air Act, which prohibits knowingly making a false certification or omitting material information;
- The status of compliance with the terms and conditions of the permit, and whether compliance was continuous or intermittent. The certification shall identify each deviation and take it into account in the compliance certification. Note that not all deviations are considered violations.¹
- Such other facts as the Division may require, consistent with the applicable requirements to which the source is subject, to determine the compliance status of the source.

The Certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred.

For example, given the various emissions limitations and monitoring requirements to which a source may be subject, a deviation from one requirement may not be a deviation under another requirement which recognizes an exception and/or special circumstances relating to that same event. Further, periods of excess emissions during startup, shutdown and malfunction may not be found to be a violation of an emission limitation or standard where the source adequately shows that any potential deviations as a result of these infrequent periods were minimized to the extent practicable and could not have been prevented through careful planning, design, or were unavoidable to prevent loss of life, personal injury, or severe property damage.

Appendix B Page 4

Note the requirement that the certification shall identify each deviation and take it into account in the compliance certification. Previously submitted deviation reports, including the deviation report submitted at the time of the annual certification, may be referenced in the compliance certification.

Startup, Shutdown, Malfunctions, Emergencies, and Upsets

Understanding the application of Startup, Shutdown, Malfunctions, Emergency provisions, and provisions is very important in both the deviation reports and the annual compliance certifications.

Startup, Shutdown, and Malfunctions

Please note that exceedances of some New Source Performance Standards (NSPS) and Maximum Achievable Control Technology (MACT) standards that occur during Startup, Shutdown or Malfunctions may not be considered to be non-compliance since emission limits or standards often do not apply unless specifically stated in the NSPS. Such exceedances must, however, be reported as excess emissions per the NSPS/MACT rules and would still be noted in the deviation report. In regard to compliance certifications, the permittee should be confident of the information related to those deviations when making compliance determinations since they are subject to Division review. The concepts of Startup, Shutdown and Malfunctions also exist for Best Available Control Technology (BACT) sources, but are not applied in the same fashion as for NSPS and MACT sources.

Emergencies and Upsets

Under the Emergency provisions of Part 70 and the Upset provisions of the State regulations, certain operational conditions may act as an affirmative defense against enforcement action if they are properly reported.

DEFINITIONS

Malfunction (NSPS) means any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.

Malfunction (SIP) means any sudden and unavoidable failure of air pollution control equipment or process equipment or unintended failure of a process to operate in a normal or usual manner. Failures that are primarily caused by poor maintenance, careless operation, or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

Emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

Air Pollution Control Division Colorado Operating Permit Monitoring and Permit Deviation Report

Appendix B Page 6

Upset means an unpredictable failure of air pollution control or process equipment which results in the violation of emission control regulations and which is not due to poor maintenance, improper or careless operations, or is otherwise preventable through exercise of reasonable care

.

APPENDIX B: Monitoring and Permit Deviation Report - Part I

- 1. Following is the **required** format for the Monitoring and Permit Deviation report to be submitted to the Division on a semi-annual basis unless otherwise noted in the permit. The Table below must be completed for all equipment or processes for which specific Operating Permit terms exist.
- 2. Part II of this Appendix B shows the format and information the Division will require for describing periods of monitoring and permit deviations, or upset or emergency conditions as indicated in the Table below. One Part II Form must be completed for each Deviation. Previously submitted reports (e.g. EER's or Upsets) may be referenced and the form need not be filled out in its entirety.

FACILITY NAME: Canyon Gas Resources – Cl	ough Compressor Station
OPERATING PERMIT NO: 950PGA137	
REPORTING PERIOD:	(see first page of the permit for specific reporting period and
dates)	

Operating Permit Unit		Deviation During F		Deviation Code ²	Condition	mergency n Reported Period?
ID	Unit Description	YES	NO		YES	NO
S001	Waukesha Model F2895GU, Serial Number 263059, Internal Combustion Engine					
S002	Caterpillar Model G399, Serial Number 49C800, Internal Combustion Engine					
S003	Caterpillar Model G399, Serial Number 49C697, Internal Combustion Engine					
S004	Caterpillar Model G399 NA HCR, Serial Number 49C771, Internal Combustion Engine					
S005	P&A Model PA-6MM-1000-3P, Serial Number 188, Glycol Dehydrator					
S006	P&A Model PA-6MM-1000-3P, Serial Number 189,Glycol Dehydrator					
S007	Sivalls Model GCR-500-450, Serial Number 42721,Glycol Dehydrator					
S008	Fugitive VOC Emissions					
S009	Waukesha Model L36GL, Serial Number C1154571, Internal Combustion Engine					
S010	Natco, Serial Number HL-9D74602-02, 8 MMscf/Day, Glycol Dehydrator with Flash Tank					
General Conditions						
Insignificant Activities						

1 = Standard: When the requirement is an emission limit or standard 2 = Process: When the requirement is a production/process limit

3 = Monitor: When the requirement is monitoring 4 = Test: When the requirement is testing

5 = Maintenance: When required maintenance is not performed
 6 = Record: When the requirement is recordkeeping
 7 = Report: When the requirement is reporting

8 = CAM: A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the

Compliance Assurance Monitoring (CAM) Rule) has occurred.

9 = Other: When the deviation is not covered by any of the above categories

¹ See previous discussion regarding what is considered to be a deviation. Determination of whether or not a deviation has occurred shall be based on a reasonable inquiry using readily available information.

FACILITY NAME: Canyon Gas Resources – Clough Compressor Station

APPENDIX B: Monitoring and Permit Deviation Report - Part II

OPERATING PERMIT NO: 950PGA137 REPORTING PERIOD:			
Is the deviation being claimed as an:	Emergency	Upset	N/A
(For NSPS/MACT) Did the deviation occur during:	Startup	Shutdown	Malfunction
	Normal Operation		
OPERATING PERMIT UNIT IDENTIFICATION:			
Operating Permit Condition Number Citation			
Explanation of Period of Deviation			
Duration (start/stop date & time)			
Action Taken to Correct the Problem			
Measures Taken to Prevent a Reoccurrence of the Pr	<u>roblem</u>		
Dates of Upsets/Emergencies Reported (if applicable	<u>e)</u>		
Deviation Code	Division Code QA:		

SEE EXAMPLE ON THE NEXT PAGE

EXAMPLE

FACILITY NAME: Acme Corp. OPERATING PERMIT NO: 96OPZZXXX REPORTING PERIOD: 1/1/96 - 6/30/96				
Is the deviation being claimed as an:	Emergency	Upset _	XX	N/A
(For NSPS/MACT) Did the deviation occur during:	Startup Normal Operation			
OPERATING PERMIT UNIT IDENTIFICATION:				
Asphalt Plant with a Scrubber for Particulate Control	ol - Unit XXX			
Operating Permit Condition Number Citation				
Section II, Condition 3.1 - Opacity Limitation				
Explanation of Period of Deviation				
Slurry Line Feed Plugged				
<u>Duration</u>				
START- 1730 4/10/96 END- 1800 4/10/96				
Action Taken to Correct the Problem				
Line Blown Out				
Measures Taken to Prevent Reoccurrence of the Pro	<u>bblem</u>			
Replaced Line Filter				
Dates of Upsets/Emergencies Reported (if applicable	<u>e)</u>			
4/10/96 to S. Busch, APCD				
Deviation Code	Division Code QA:			

APPENDIX B: Monitoring and Permit Deviation Report - Part III

REPORT CERTIFICATION

SOURCE NAME: Canyon Gas Resources -	- Clough Compressor Station
FACILITY IDENTIFICATION NUMBER	R: 0450077
PERMIT NUMBER: 95OPGA137	
REPORTING PERIOD:	(see first page of the permit for specific reporting period and dates)
responsible official signing this certification	nual Deviation Reports must be certified by a responsible official. The nust be pre-approved by the Division in accordance with Colorada. This signed certification document must be packaged with the
STATEMENT OF COMPLETENESS	
	submitted in its entirety and, based on information and belie fy that the statements and information contained in this submitta
1-501(6), C.R.S., makes any false materi	tate that any person who knowingly, as defined in Sub-Section 18 rial statement, representation, or certification in this document is bunished in accordance with the provisions of Sub-Section 25-
Printed or Typed Name	Title
Signature of Responsible	ple Official Date Signed
Note: Deviation reports shall be submit permit. No copies need be sent to the U.S.	itted to the Division at the address given in Appendix D of thi S. EPA.
Operating Permit Number: 96OPGA137	Last Revised: 10/31/0

APPENDIX C Required Format for Annual Compliance Certification Reports

Following is the format for the Compliance Certification report to be submitted to the Division and the U.S. EPA annually based on the effective date of the permit. The Table below must be completed for all equipment or processes for which specific Operating Permit terms exist.

FACILITY NAME: Canyon Gas Resources – Clough Compressor Station OPERATING PERMIT NO: 950PGA137 REPORTING PERIOD:

I. Facility Status

During the entire reporting period, this source was in compliance with ALL terms and cond	ditions contained
in the Permit, each term and condition of which is identified and included by this reference.	The method(s)
used to determine compliance is/are the method(s) specified in the Permit.	
With the possible exception of the deviations identified in the table below, this source was	is in compliance

with the possible exception of the deviations identified in the table below, this source was in compliance with all terms and conditions contained in the Permit, each term and condition of which is identified and included by this reference, during the entire reporting period. The method used to determine compliance for each term and condition is the method specified in the Permit, unless otherwise indicated and described in the deviation report(s). Note that not all deviations are considered violations.

Operating Permit Unit ID	Unit Description	Deviations Reported ¹		Monitoring Method per Permit? ²		Was compliance continuous or intermittent? ³		Was Data Continuous? ⁴	
		Previous	Current	YES	NO	Continuous	Intermittent	YES	NO
S001	Waukesha Model F2895GU, Serial Number 263059, Internal Combustion Engine								
S002	Caterpillar Model G399, Serial Number 49C800, Internal Combustion Engine								
S003	Caterpillar Model G399, Serial Number 49C697, Internal Combustion Engine								
S004	Caterpillar Model G399 NA HCR, Serial Number 49C771, Internal Combustion Engine								
S005	P&A Model PA-6MM- 1000-3P, Serial Number								

Operating Permit Unit ID	Unit Description	Deviations Reported ¹		Mathad par		Was compliance continuous or intermittent? ³		Was Data Continuous? ⁴	
		Previous	Current	YES	NO	Continuous	Intermittent	YES	NO
	188, Glycol Dehydrator								
S006	P&A Model PA-6MM- 1000-3P, Serial Number 189,Glycol Dehydrator								
S007	Sivalls Model GCR-500- 450, Serial Number 42721,Glycol Dehydrator								
S008	Fugitive VOC Emissions								
S009	Waukesha Model L36GL, Serial Number C1154571, Internal Combustion Engine								
S010	Natco, Serial Number HL-9D74602-02, 8 MMscf/Day, Glycol Dehydrator with Flash Tank								
General Conditions									
Insignificant Activities ⁵									

¹ If deviations were noted in the previous deviation report (i.e. for the first six months of the annual reporting period), put an "X" under "previous". If deviations were noted in the current deviation report (i.e. for the last six months of the annual reporting period), put an "X" under "current". Mark both columns if both apply.

March 2000

The Periodic Monitoring requirements of the Operating Permit program rule are intended to provide assurance that even in the absence of a continuous system of monitoring the Title V source can demonstrate whether it has operated in continuous compliance for the duration of the reporting period. Therefore, if a source 1) conducts all of the monitoring and recordkeeping required in its permit, even if such activities are done periodically and not continuously, and if 2) such monitoring and recordkeeping does not indicate non-compliance, and if 3) the Responsible Official is not aware of any credible evidence that indicates non-compliance, then the Responsible Official can certify that the emission point(s) in question were in continuous compliance during the applicable time period.

² Note whether the method(s) used to determine the compliance status with each term and condition was the method(s) specified in the permit. If it was not, mark "no" and attach additional information/explanation.

³ Note whether the compliance status with of each term and condition provided was continuous or intermittent. "Intermittent Compliance" can mean either that noncompliance has occurred or that the owner or operator has data sufficient to certify compliance only on an intermittent basis. Certification of intermittent compliance therefore does not necessarily mean that any noncompliance has occurred.

	whethe	· /	used to determine	the compliance	status with each ter	rm and condition pro	ovided continuous (
⁵ Com	pliance s	tatus for these so	irces shall be based	d on a reasonable i	nquiry using readily a	vailable information.				
II.	Status for Accidental Release Prevention Program:									
	A.	•		•	is not subject) of the Federal C	t to the provisions lean Air Act)	of the Accidenta			
	В.	If subject: Trequirements	The facilitys of section 112	is	is not	in compliance	e with all th			
		1. A Ri	sk Managemen opriate authority	t Plan y and/or the des	will be ignated central loo	has been cation by the requi	n submitted to th			
III	Certi	fication								
C.R.S	S., mak	es any false m or and may be	aterial statemo punished in ac	ent, representa	tion, or certifica	vingly, as defined tion in this docum f § 25-7 122.1, C.	nent is guilty of R.S.			
		Printed or T	ped Name			Ti	tle			
		•	ertifications sha		d to the Air Pol n Appendix D of t	lution Control Di	e Signed vision and to th			

APPENDIX D Notification Addresses

1. **Air Pollution Control Division**

Colorado Department of Public Health and Environment Air Pollution Control Division Operating Permits Unit APCD-SS-B1 4300 Cherry Creek Drive S. Denver, CO 80246-1530

ATTN: Jim King

2. United States Environmental Protection Agency

Compliance Notifications:

Office of Enforcement, Compliance and Environmental Justice Mail Code 8ENF U.S. Environmental Protection Agency, Region VIII 999 18th Street, Suite 500 Denver, CO 80202

Permit Modifications, Off Permit Changes:

Office of Pollution Prevention, State and Tribal Programs Air Program, 8P-AR U.S. Environmental Protection Agency, Region VIII 999 18th Street, Suite 300 Denver, CO 80202

APPENDIX E Permit Acronyms

Listed Alphabetically:

AIRS -	Aerometric Information Retrieval System
AP-42 -	EPA Document Compiling Air Pollutant Emission Factors
APEN -	Air Pollution Emission Notice (State of Colorado)
APCD -	Air Pollution Control Division (State of Colorado)
ASTM -	American Society for Testing and Materials
BACT -	Best Available Control Technology
BTU -	British Thermal Unit
CAA -	Clean Air Act (CAAA = Clean Air Act Amendments)
CCR -	Colorado Code of Regulations
CEM -	Continuous Emissions Monitor
CF -	Cubic Feet (SCF = Standard Cubic Feet)
CFR -	Code of Federal Regulations
CO -	Carbon Monoxide
COM -	Continuous Opacity Monitor
CRS -	Colorado Revised Statute
EPA -	Environmental Protection Agency
FR -	Federal Register
G -	Grams
Gal -	Gallon
HAPs -	Hazardous Air Pollutants
HP -	Horsepower
HP-HR -	Horsepower Hour (G/HP-HR = Grams per Horsepower Hour)
LAER -	Lowest Achievable Emission Rate
LBS -	Pounds
M -	Thousand
MM -	Million
MMSCF -	Million Standard Cubic Feet
MMscfd -	Million Standard Cubic Feet per Day
N/A or NA -	Not Applicable
NOx -	Nitrogen Oxides
NESHAP -	National Emission Standards for Hazardous Air Pollutants
NSPS -	New Source Performance Standards
PM -	Particulate Matter
PM_{10} -	Particulate Matter Under 10 Microns
PSD -	Prevention of Significant Deterioration
PTE -	Potential To Emit
RACT -	Reasonably Available Control Technology

SCC -	Source Classification Code
SCF -	Standard Cubic Feet
SIC -	Standard Industrial Classification
SO_2 -	Sulfur Dioxide
TPY -	Tons Per Year
TSP -	Total Suspended Particulate
VOC -	Volatile Organic Compounds

APPENDIX F Permit Modifications

DATE OF REVISION	SECTION NUMBER, CONDITION NUMBER	DESCRIPTION OF REVISION
June 6, 2001	Cover pages	Revised company name and address, contact person, responsible officiak, phone numbers
	Appendix B and C	Revised to reflect current version
August 16, 2001	Cover pages	Revised company name and address, contact person, responsible officiak, phone numbers
September 10, 2001	Cover pages	Revised nature of business and SIC
	Appendix B and C	Revised source name
October 31, 2001	Cover pages	Revised Monitoring Report and Compliance Certification due dates.
	Section I, Item 2	Revised Alternative Operating Scenario language to reflect the current version
	Section II, Conditions 1.3, 2.3 and 3.3 and Tables 1, 2 and 3	Revised opacity language to reflect current version

APPENDIX G Required Method for Fuel Consumption Allocation

*The methods outlined will be used if each piece of fuel burning equipment doesn't have an individual fuel meter to calculate fuel use from Internal Combustion Engines S001-S004 and S009.

FUEL ALLOCATION TO INDIVIDUAL ENGINES

Allocated Fuel Consumption = [Design Heat Rate][Hrs. of Operation][Site Rated Horsepower] X [Facility Fuel Use for Month]

[Sum of Numerator for Each Engine]

Unit Number	Site Rated Horsepower
S001	310
S002	472
S003	472
S004	472
S009	750